### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

TALLIAH MUHAMMAD	)	
Plaintiff,	)	
vs.	)	Civil Action File No.
ASHFORD AT STONERIDGE APTS. LP,	)	
Defendants.	)	

### NOTICE TO PLAINTIFF OF REMOVAL TO FEDERAL COURT

TO: Taliah Muhammad 1048 Flat Shoals Rd. Apt. 703 Atlanta, Ga. 30349

YOU ARE HEREBY notified of the filing of a Notice of Removal to the United States District Court for the Northern District of Georgia, Atlanta Division, of the case entitled *Taliah Muhammad v. Ashford at Stoneridge Apts. LP*, Clayton Superior Court, Civil Action File No. 2023CV03017-12 in accordance with the provisions of Section 1441 & 1446(d), Title 28 of the United States Code. Plaintiff asserted a federal question in her Complaint as she asserts a claim of violation of the Federal Fair Housing Act. Pursuant to 28 U.S.C. §1446(a), copies of

Plaintiff's Complaint and all pleadings filed in the Superior Court of Clayton County are attached hereto as Exhibit A.

Promptly after the filing of this Notice of Removal, Defendant shall provide notice of the removal to Plaintiff and shall file a copy of this Notice with the clerk of the County in the Superior Court Action, as required by 28 U.S.C. §1446(d). Defendant reserves any and all rights to assert any and all defenses and/or objections to the Complaint. Defendants further reserve the right to amend or supplement this Notice of Removal.

DATED this 12th day of December, 2023.

Fowler, Hein, Cheatwood & Williams, P.A.

Fowler, Hein, Cheatwood & Williams, P.A. 2970 Clairmont Road Suite 220 Atlanta, Georgia 30329 (404) 633-5114 mwilliams@apartmentlaw.com

/s/ J. Mike Williams
J. Mike Williams
Georgia Bar No. 765209

# **LOCAL RULE 7.1 (D) CERTIFICATION**

The undersigned counsel for Defendant Ashford At Stoneridge Apts. LP hereby certifies that the foregoing has been prepared in accordance with one of the font (Times Roman) and point selections (14 pt) approved by the Court in Local 5.1(B) and (C).

Respectfully submitted this 12th day of December, 2023, by:

/s/ J. Mike Williams
J. Mike Williams

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

TALLIAH MUHAMMAD	)	
Plaintiff,	)	
VS.	) Civil Action File No	о.
ASHFORD AT STONERIDGE APTS. LP,	) , )	
Defendants.	)	

### **CERTIFICATE OF SERVICE**

This is to certify that I have this day served the opposing party in the foregoing matter with a copy of the foregoing **NOTICE TO PLAINTIFF OF REMOVAL TO FEDERAL COURT** by depositing in the United States Mail a copy of same in an envelope with adequate postage thereon, addressed as follows:

Taliah Muhammad 1048 Flat Shoals Rd., Apt. 703 Atlanta, Ga. 30349

DATED this 12th day of December, 2023.

/s/ J. Mike Williams
J. Mike Williams
Georgia Bar No. 765209
mwilliams@apartmentlaw.com